

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES)  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. )

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al, )

Defendants. )

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VOLUME I OF THE VIDEOTAPED  
30(b)(6) DEPOSITION OF TIMOTHY MAUPIN,  
produced as a witness on behalf of the Plaintiff in  
the above styled and numbered cause, taken on the  
21st day of July, 2008, in the City of Tulsa, County  
of Tulsa, State of Oklahoma, before me, Lisa A.  
Steinmeyer, a Certified Shorthand Reporter, duly  
certified under and by virtue of the laws of the  
State of Oklahoma.

**TULSA FREELANCE REPORTERS**  
**918-587-2878**

**EXHIBIT**

11

1 A At which location?

2 Q Any.

3 A Yes. The Virginia growers are --

4 Q I'm sorry, I thought I said IRW. Let's move  
5 to the IRW. You've already told me what is going on 04:43PM  
6 in Virginia. My concern is what accountability or  
7 tracking of land application for Cargill contract  
8 growers is occurring in the IRW.

9 MS. HILL: Object to the form.

10 A We don't track the poultry litter on our 04:43PM  
11 contract producers' farms. That's part of their  
12 site-specific plan, and they're responsible for  
13 nutrient management and litter storage on the farms.

14 Q Okay. I've been given a notice that we've got  
15 to change tapes, so let's stop and do that. 04:44PM

16 VIDEOGRAPHER: We're now off the Record.  
17 The time is now 4:44 p.m.

18 (Following a short recess at 4:44 p.m.,  
19 the deposition was recessed at 5:01 p.m.)  
20  
21  
22  
23  
24  
25

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